

1 "Linda called"?

2 A Yes.

3 Q Do you know whose writing that is?

4 A No, sir.

5 Q In all -- it would have been the normal course,  
6 though, for you to have received such a memo, even if you  
7 don't have an independent recollection of it, correct?

8 A Yes, sir.

9 Q Would you please turn to Mass Media Exhibit 205?

10 A Yes, sir.

11 Q Specifically page 3?

12 A Yes, sir.

13 Q There are some signatures that appear on this docu-  
14 ment and they are a little fuzzy so if you would please iden-  
15 tify them for us?

16 A I believe that would be my brother Phillip Crouch.

17 Q Now that -- his signature appears in both places?

18 A Yes.

19 Q You recognize this document as an ownership report  
20 to be filed with the Commission, correct?

21 A Yes, I see that.

22 Q And what, if any, involvement would you personally  
23 have had in the preparation of the information that would go  
24 into this document?

25 A I would have typically had no involvement in this.

1 Q Who would have?

2 A Is this for TBN or National Minority?

3 Q Well, let's look at the first page; the cover letter  
4 that accompanies it. It reflects that it's a consolidated  
5 ownership report and then it has a list of stations.

6 A Um-hum.

7 Q Do you see that?

8 A Yes, sir, I do.

9 Q It has the TBN owned and operated stations and it  
10 also has Odessa.

11 A I see that.

12 Q So my question is, who in the normal course would  
13 have been involved in the preparation of such a document?

14 A Mrs. Duff and, and Mr. May.

15 Q Would you please turn to Mass Media Exhibit 210?

16 A Yes, sir.

17 Q The second paragraph notes the persons present, and  
18 one of the persons present was Jane Duff. Do you see that?

19 A Yes.

20 Q Now, just to familiarize yourself with what this  
21 document is, and you know it says it's a special meeting,  
22 minutes of a special meeting of Trinity Christian Center of  
23 Santa Ana, Inc., I'd like you take a brief look through it;  
24 and the question that I have for you is why is Mrs. Duff at  
25 this meeting?

1           A     I believe she was there simply as assistant to the  
2 president, and since part of the consideration here were  
3 possible pay increases for certain individuals she may have  
4 been there to assist us in those deliberations.

5           Q     And that's because some of those -- one or more of  
6 those individuals was directly supervised by her?

7           A     Yes, one was her personal secretary, Cheri Duff.  
8 There may have been one other person that was closely related  
9 to her, and that's about the best that I can do, Mr. Shook.

10          Q     Very good. Would you please turn to Mass Media  
11 Exhibit 211?

12          A     Yes, sir.

13          Q     Now this is the audit report for Trinity  
14 Broadcasting Network, Inc. and subsidiaries -- and subsidiary  
15 and affiliates for the year ending December 31, 1987. Do you  
16 see that?

17          A     Yes, sir.

18          Q     And if you turn to page 5, there's a date down at  
19 the bottom left that indicates that this document was trans-  
20 mitted to Trinity on or about August 15, 1988. Do you see  
21 that?

22          A     Yes.

23          Q     Now, in the -- on page 5, the second-to-last  
24 paragraph, it states that the audit report on Community  
25 Educational Television has been covered by a separate report.

1 Do you have, do you have any -- well, did you have any  
2 involvement in determining whether or not Community  
3 Educational Television should have a separate audit report or  
4 was that handled by other persons?

5 A To the best of my recollection, Mr. Shook, it was,  
6 it was Mr. May's recommendation that because the CET stations  
7 were a completely separate class of stations, i.e., noncommer-  
8 cial stations, that, that they should have a, a separate  
9 financial report. As to exactly why that was his recommenda-  
10 tion, I, I really do not know.

11 Q All right, could you turn to pages -- well, starting  
12 on page 9.

13 A Yes, sir.

14 Q Apparently the information on page 9 continues for a  
15 number of columns and is not completed until page 13. You may  
16 just want to glance through that to ascertain that for your-  
17 self.

18 A Yes, sir, I see that.

19 Q Now, turning back to page 9, you will note that  
20 there are a number of columns; there are four columns on that  
21 page.

22 A Yes.

23 Q And then when you turn to page 10, there are four  
24 more.

25 A Yes, sir, I see that.

1 Q And 11 has four more.

2 A Exactly.

3 Q Twelve has four more.

4 A Correct.

5 Q And then we get to the final two columns on page 13.

6 A Yes.

7 Q Do you see that on page 9, National Minority is  
8 listed; it has its own column?

9 A Yes.

10 Q Now this is August of 1988. Do you have any expla-  
11 nation as to why National Minority is listed in this audit  
12 report in August of 1988?

13 A Well, remember while this is August of '88, the  
14 report covers the period ending December 31, '87. We're not  
15 getting this audited report until approximately 8 months  
16 later. It typically takes the auditor 6 to 8 months to go  
17 through all the records for the previous year and submit a  
18 final report to the board.

19 Q Now, if, if memory serves me, yesterday in, in  
20 testimony there were -- I think, I think you testified that  
21 you had received advice from Mr. May that certain separations  
22 were to occur. Was the separation also supposed to have  
23 occurred relative to the financial report?

24 A He -- the separations we discussed yesterday cer-  
25 tainly included separate board meetings completely apart from

1 the, the Trinity combined board meetings, but I do not recall  
2 any discussion that indicated that the individual line item  
3 financial report of the National Minority accounts should be  
4 separated by the auditors.

5 Q Aside from National Minority, every other entity  
6 listed here could be viewed as a Trinity owned and operated  
7 corporation, wouldn't it? And if you're having some trouble  
8 in terms of what they are, you know, you go through them one  
9 by one --

10 A No, I've done that and that is absolutely correct.

11 Q Now if you turn to page 19 --

12 A Yes, yes, sir.

13 Q -- underneath the heading "Organization" --

14 A Yes, sir.

15 Q -- do you see the words "Direct Affiliates"?

16 A Yes, sir.

17 Q Now, apparently in one instance the auditors had  
18 caught the change in nomenclature. In this instance they had  
19 not, and you still see Translator TV, Inc. here.

20 A My memory tells me that they'd been classifying  
21 Translator TV as a direct affiliate all along.

22 Q So this is just a continuation of what's taken place  
23 in the past.

24 A I believe that's the case.

25 Q But there had been no conversations between you and

1 the auditors as to why Translator TV, Inc. would be listed as  
2 a direct affiliate.

3 A As, as we've discussed a number of times, Mr. Shook,  
4 I, I believe we all understood that Translator TV, because of  
5 its commonality of board members, should be listed as an  
6 affiliate.

7 Q With respect to this particular report, do you  
8 recall there being any conversation as to how to deal with  
9 National Minority TV and what to classify it as?

10 A No, sir, I -- it is evident to me that they simply  
11 picked up the pattern that has gone on for some time and just  
12 continued it.

13 JUDGE CHACHKIN: I, I have one further question.  
14 Look at page 18.

15 DR. CROUCH: Yes, sir.

16 JUDGE CHACHKIN: Do you have any explanation why  
17 National Minority, which is supposed to be an independent  
18 corporation, is included in the combined TBN totals for reve-  
19 nue, expenses, support services?

20 DR. CROUCH: Well, sir, all I can say is it, it was  
21 an entity in which TBN had an interest. It was completely  
22 separate as far as its books and its records were concerned.  
23 This is simply the way the auditors put it together because  
24 of, as we've said so often, the commonality of board members.  
25 It was picked up by the auditors and simply included in the

1 overall subsidiary and affiliates report as, as indicated in  
2 the heading here.

3 JUDGE CHACHKIN: So you think it was properly  
4 included as in the combined TBN total?

5 DR. CROUCH: At the time, sir, I had no reason to  
6 believe it was improper.

7 MR. TOPEL: Your Honor, I just --

8 JUDGE CHACHKIN: Pardon me?

9 MR. TOPEL: Your Honor, just -- I believe this is a  
10 subject that's covered in Joint Exhibit 1 in the stipulation.  
11 I won't -- don't state in front of the witness what's covered  
12 in there.

13 JUDGE CHACHKIN: I doubt that --

14 MR. COHEN: I don't think, Your Honor, the question  
15 you asked is covered in the --

16 JUDGE CHACHKIN: This is not an accounting problem.  
17 We're talking about --

18 MR. COHEN: Exactly.

19 JUDGE CHACHKIN: -- here is the reason why NMTV,  
20 which is a different entity, is included in the combined TBN  
21 total --

22 MR. TOPEL: Right.

23 JUDGE CHACHKIN: -- under revenue, expenses, and  
24 public support.

25 MR. COHEN: I don't think that's covered in, in the



1 stipulation.

2 MR. TOPEL: The stipulation will speak for itself  
3 but I --

4 JUDGE CHACHKIN: I understand that. I just wanted  
5 the witness's explanation, if he had any, why it was included  
6 in the --

7 MR. TOPEL: I, I, I understand, Your Honor, and --

8 JUDGE CHACHKIN: -- in the combined TBN total. Go  
9 ahead, Mr. Shook.

10 MR. COHEN: Your Honor, I didn't understand the  
11 witness had finished answering your question but maybe he did.

12 JUDGE CHACHKIN: Do you have any further explanation  
13 of why it was -- why NMTV is included in the combined TBN --

14 DR. CROUCH: Sir, the only, the only thing I can,  
15 can say is what I, I believe I've already stated. I have --

16 JUDGE CHACHKIN: Well, it's up to you if you have  
17 anything further. Mr. Cohen thought you had something further  
18 you wished to add.

19 DR. CROUCH: I, I simply had no reason to believe at  
20 the time that there was anything improper with this as long as  
21 the separate books and accounts were indeed maintained.

22 JUDGE CHACHKIN: All right, go ahead, Mr. Shook.

23 BY MR. SHOOK:

24 Q Dr. Crouch, could you please turn to Mass Media  
25 Exhibit 213?

1           A     Yes, sir.

2           Q     And I'd like you to turn to page 2?

3           A     Yes, sir.

4           Q     Underneath the caption that reads, "Please pledge  
5 for your TV station" -- do you see that?

6           A     Yes, sir.

7           Q     There are a listing of stations.

8           A     Yes, sir, I see them.

9           Q     Do you -- beginning with Channel 40/LA?

10          A     Yes.

11          Q     What common thread, if any, exists with respect to  
12 the listed stations there?

13          A     Again, sir, the, the commonality of members of the  
14 boards of directors is the common thread.

15          Q     And that's, that's, that's your testimony as to why  
16 the CET stations for South Texas, Beaumont, and Houston are  
17 included?

18          A     Yes, sir.

19          Q     Every other station listed, though, you would say is  
20 an owned and operated station?

21          A     Yes, sir.

22          Q     But as far as you're concerned right now, the CET  
23 stations are not, and by -- let me rephrase that. At the time  
24 of this newsletter, September 1988, is it your testimony that  
25 the CET stations are not owned and operated by TBN?

1           A     We've discussed this subject a number of times,  
2 Mr. Shook, and, and all I can say is that I believe at the  
3 time that a majority of the board of directors of CET were,  
4 indeed, a majority of the board of directors for the Trinity  
5 owned and operated stations, so I leave that to you lawyers to  
6 determine if that is an owned and operated station.

7           Q     Well, you do recall from almost the first questions  
8 and answers that we had with each other that I had directed  
9 your attention to a portion of your testimony where the words  
10 "owned and operated" appeared, and I asked you for, you know,  
11 your own understanding of what that meant and you gave it to  
12 us, and I take it that definition has not changed?

13          A     I, I don't believe it has.

14          Q     Would you turn to Mass Media Exhibit 214?

15          A     Yes, sir.

16          Q     Could you tell me how it came about that this action  
17 by written consent occurred?

18          A     I have no personal independent recollection of that,  
19 sir, no.

20          Q     It wasn't at your behest that Charlene Williams was  
21 elected to the office of assistant secretary?

22          A     It could have been but I just don't recall.

23          Q     Would you please turn to Mass Media Exhibit 215?

24          A     Yes, sir.

25          Q     Now here Charlene Williams is being elected to the

1 office of assistant secretary for Trinity Broadcasting of  
2 Florida.

3 A Yes.

4 Q Now with the action having taken place for National  
5 Minority TV and for Trinity Broadcasting of Florida, is  
6 this -- was Charlene Williams essentially elected to the  
7 office of, of assistant secretary for every TBN company?

8 A It is my understanding and belief that she was.

9 Q And why was that?

10 A Again, Mrs. Williams was the director of finance at  
11 the time and, as we've discussed so often, it was for signa-  
12 tory convenience because so many of us traveled.

13 Q Would she also have been elected assistant secretary  
14 of Community Educational Television?

15 A She may have been but I just don't recall.

16 Q May have been. Would there have been a reason why  
17 she would not have been elected as assistant secretary to  
18 Community Educational Television?

19 A I could think of no such reason.

20 Q Would you please turn to Mass Media Exhibit 217?

21 A Yes, sir.

22 Q Did you review this form prior to the time it was  
23 sent to the Internal Revenue Service?

24 A I have no recollection of, of so reviewing.

25 Q Do you know whether anyone on the board of National

1 Minority TV reviewed this form prior to the time it was sent  
2 to the Internal Revenue Service?

3 A No, sir, I do not.

4 Q Did you have any discussions with any of the other  
5 board members about -- board members of National Minority TV  
6 about the information that appears in this Form 990?

7 A No, sir.

8 Q Aside from the accounting firm that was utilized,  
9 and the information for that appears on page 4 -- you see  
10 Richard E. Hoffman signed it on behalf of Hoffman and Company.  
11 Would this have been the Form 990, and the information herein,  
12 have been a product of the TBN finance -- the accounting  
13 office?

14 A Most probably.

15 Q Would you turn to Mass Media Exhibit 218?

16 A Yes, sir.

17 Q Do you recall receiving this memo on or about  
18 September 30, 1988?

19 A I'm sure I did receive it. I, as I've said so  
20 often, I, I just don't have any clear independent memory of  
21 receiving it but I'm sure I did.

22 Q A memo of this type you would have seen in the  
23 normal course relatively shortly after the date of its  
24 sending, September 30, 1988?

25 A Yes, sir.

1 Q Would you please turn to Mass Media Exhibit 219?

2 A Yes, sir?

3 Q This is the newsletter for October 1988. Could you  
4 turn to page 3?

5 A Yes, sir.

6 Q Under the first caption where it says, "Victories  
7 this year," did you have any involvement in, you know, the  
8 writing of this caption, the information that appears in here?

9 A I, I would certainly have supplied the subject  
10 matter but, no, sir, as I've stated so often, I, I did not  
11 author the, the captions.

12 Q Well, the information that's, that's covered in  
13 here, you know, just read it through to yourself if you're not  
14 really sure what I'm talking about, but the information that's  
15 covered in here seems to cover a rather wide range of activi-  
16 ties. For example, we have San Salvador being mentioned; a  
17 Chinese program being mentioned; "Saint Lucia is under con-  
18 struction"; "stations in Italy are going to go up"; "Portland  
19 has just been granted"; "a Dallas studio is under construc-  
20 tion"; "Houston is on the air"; "Midland/Odessa is going to be  
21 on the air very soon." Do you see all that?

22 A Yes, sir.

23 Q Now, who would put this together?

24 A As I said, I would have certainly furnished the, the  
25 basic material. This is, this is simply a, a network-wide

1 report of exciting events that, that had occurred that partic-  
2 ular year. The information as to what those victories were  
3 were pretty well known to everyone on the staff as well as  
4 myself, of course, and these items were simply enumerated in  
5 this caption to, to give our viewers and supporters a, a feel  
6 for the significant growth and events that had occurred that  
7 year.

8 Q Could you please turn to page 6?

9 A Yes, sir.

10 Q Down at the bottom, "studios located at."

11 A Yes, sir.

12 Q The stations that are noted are the owned and oper-  
13 ated stations plus the CET stations, do you see that?

14 A Yes, sir.

15 Q Now by including the CET stations here, is that  
16 supposed to indicate that they are also owned and operated or  
17 not?

18 A Under the definition we've agreed to, they are owned  
19 and operated.

20 Q Would you please turn to Mass Media Exhibit 223?

21 A Yes, sir.

22 Q Now this document, which is 11 pages, and I'm not  
23 going to ask you to look at all 11 pages, reflects that it's  
24 the affiliation agreement between National Minority TV and  
25 Trinity Broadcasting Network with respect to

1 Channel 42/Odessa, Texas. Do you see that?

2 A Yes, sir.

3 Q And the date of the agreement appears to be  
4 October 21, 1988.

5 A Yes.

6 Q Now, if you turn to page 11 --

7 A Yes, sir.

8 Q -- you will note that there is just one signature.

9 A Yes.

10 Q That the space for Trinity Broadcasting Network,  
11 Inc. has no signature.

12 A Yes.

13 Q Are you aware of any affiliation that reflects a  
14 signature of both National Minority TV and Trinity  
15 Broadcasting Network?

16 A No, sir.

17 Q Were you aware that an affiliation agreement had  
18 been prepared for National Minority TV for Channel 42 in  
19 Odessa?

20 A Yes, sir, I was generally aware that such an agree-  
21 ment was being prepared.

22 Q Were you involved in any way in determining what the  
23 terms of such an agreement should be?

24 A I was involved much earlier in the standard agree-  
25 ment that was prepared between Trinity and counsel but this



1 was -- and I believe does reflect the standard affiliation  
2 agreement that was entered into between National Minority and  
3 Trinity.

4 Q But by standard affiliation agreement, are you  
5 thinking of the required carriage of the "Praise the Lord"  
6 program for 3 hours, 5 days a week; and are you also thinking  
7 of the general 80 percent of the ZIP code revenues going to  
8 the affiliate and 20 percent going to Trinity?

9 A Yes.

10 Q Is that what you have in mind?

11 A Yes, sir.

12 Q Do you have anything else in mind?

13 A No, sir.

14 Q Are you aware of any special or peculiar terms that  
15 exist in this affiliation agreement? And if you wish, you  
16 know, you can take, take your time and look through it to see  
17 if there is anything that you can recall, but keep that ques-  
18 tion in mind.

19 A Um-hum.

20 Q Are you aware of, or were you aware, of any peculiar  
21 terms?

22 A I was not aware of any peculiar terms. In my under-  
23 standing, it was simply the standard affiliation agreement  
24 that we had with many other entities.

25 Q Do you have any explanation as to why the

1 affiliation agreement is signed only by Mrs. Duff on behalf of  
2 National Minority TV?

3 A I don't, sir. I have to assume that another copy  
4 does exist somewhere that would have been signed by probably  
5 the, the program director of the network.

6 Q But you're speculating now on that subject, correct?

7 A I am, sir. And as I review the, the pages of this  
8 document, of course, I, I'm not reading line by line each  
9 portion of it but it, it certainly still appears to me to be  
10 the, the, the standard affiliation agreement.

11 Q Do you have any knowledge as to how this affiliation  
12 agreement came to be? In other words, you know, how, how was  
13 it prepared; who was involved in that process?

14 A To my knowledge, Mrs. Duff would have been the  
15 primary person involved in this.

16 Q For all you know, she could have been the only  
17 person involved in it?

18 A Yes.

19 Q Could you please turn to Mass Media Exhibit 225?

20 A Yes, sir.

21 Q Could you please turn to -- now this is the newslet-  
22 ter for November 1988. Could you please turn to page 3?

23 A Yes, sir.

24 Q Down at the bottom where it says, "149 stations and  
25 still growing," do you see that?

1 A Yes.

2 Q Do you have -- did you have any involvement in the  
3 preparation of this directory of TBN owned and affiliated  
4 stations?

5 A No, sir, but I, I certainly recall that I requested  
6 that, that such a listing be prepared just to advise our  
7 viewers and supporters of the, of the growth of the network.

8 Q Now some of these stations are in large type and  
9 some of the stations are in a smaller type. Do you see that?

10 A Yes, sir.

11 Q Would I be correct that the stations in large type  
12 are the full-power stations and the stations in the small  
13 stations are the low-power stations?

14 A That certainly appears to be the case, sir, yes.

15 Q Could you please turn to Mass Media Exhibit 226?

16 A Yes, sir.

17 Q Could you tell us what it is we're looking at?

18 A Yes, this is a memorandum from George Sebastian to  
19 myself telling me that Channel 56/Fresno, California, signed  
20 on the air. I'm looking for a date here.

21 Q There appears to be one in the upper right-hand  
22 portion of the memo.

23 A Yes, November 17th, 1988.

24 Q Now, recall, if you will, that the Fresno grant was  
25 made June 23, 1988, and we have the station up and running by

1 November. Do you see that?

2 A Yes, sir.

3 Q So it's a period of approximately 5 months.

4 A Yes.

5 Q And during the entirety of that period, the Houston  
6 permit is available and apparently no action is being taken to  
7 build on that. Were you aware of that?

8 A I was generally aware of that, Mr. Shook, and I  
9 think the, the struggle with, with the Houston area was the  
10 fact that the Houston area was, was being covered with another  
11 affiliated or, or owned and operated station, a full power,  
12 noncommercial station, Channel 14, so there was some discus-  
13 sion as to whether the station should be built or should not  
14 be built. It, it was my desire, basically, that the station  
15 be built, as we've discussed already, because the, the tele-  
16 thons, the network telethons, could have been carried on that  
17 station whereas the network telethons could not be carried on  
18 the noncommercial station but had to have their own separate  
19 telethon. So the best I can recall is that there seemed to be  
20 a little inter-staff discussion and debate on whether or not  
21 that station really should be built or should not be built  
22 because of the duplication in coverage.

23 Q Do you recall who was involved in that discussion?

24 A Certainly Mrs. Duff was, and myself was -- I'm not  
25 sure who else might have been brought into that discussion or

1 consideration.

2 Q Did anything come up in the discussion which sug-  
3 gested that National Minority TV was too busy to build Houston?

4 A I, I do believe Mrs. Duff gave that as, as one of  
5 her reasons, at least, that she was getting involved in so  
6 many other areas of, of the network that it just didn't make a  
7 lot of sense to build that station. It was her opinion that  
8 the station should not be built and should simply be sold.

9 Q Well, in point of fact, isn't it true that the  
10 busyness of National Minority TV, or its plate being full, had  
11 absolutely nothing to do with the decision not to build  
12 Houston?

13 A I, I don't know that for a fact.

14 Q Well, let us review something here. In the case of  
15 Fresno, Fresno was built in a period of less than 5 months.  
16 In the entire period, during that entire period, we have  
17 nothing, there is nothing that we're aware of -- and if there  
18 is something to the contrary please help us -- but there is  
19 nothing we're aware of that suggests any activity whatsoever  
20 was made in respect to Houston.

21 A So your question is?

22 Q Well, my question is what connect, if any, was there  
23 between National Minority's plate being full or being busy and  
24 the decision not to build Houston?

25 A That certainly wasn't a consideration on my part.

1 If it was on Mrs. Duff, I, I don't know. You, you would have  
2 to ask her.

3 Q Now, secondarily with respect to Houston, are you  
4 saying that you had wanted to build the station in order to  
5 program it or did you want to build it simply to sell a built  
6 station as opposed to selling a bare permit?

7 A As I, as I search my memory, I, I think there proba-  
8 bly was some consideration that, you know, a -- if we did sell  
9 the station that a better price could be garnered for it if it  
10 were a built and -- operating station, but my primary reason,  
11 as I've said earlier, was that I felt that more support for  
12 NMTV could be generated by virtue of the network telethons  
13 being able to be carried on it.

14 MR. SHOOK: Howard, could you place before the  
15 witness your TBF Exhibit 101, Volume 2A.1, Tab A?

16 COURT REPORTER: Could I change the tape?

17 MR. SHOOK: Yes, go ahead.

18 (Whereupon, a brief recess was taken.)

19 COURT REPORTER: Back on the record.

20 JUDGE CHACHKIN: The witness has a document,  
21 Mr. Shook.

22 BY MR. SHOOK:

23 Q Now, Dr. Crouch, you'll note first that the date is  
24 April 26th, 1989, which is a number of months after the, after  
25 the memo and the date that we're looking at right now, so

1 | there's a difference here between November and the next April.

2 |       A     Yes, yes, sir.

3 |       Q     I want you to focus on the second-to-the-last para-  
4 | graph that begins "Paul and I."

5 |       A     I've read that.

6 |       Q     Now, does that help your memory in terms of what, if  
7 | any, discussions you had with Mrs. Duff about the Houston  
8 | situation?

9 |       A     I simply remember that we, we did not agree on the,  
10 | on the selling of the permit. As she indicates here, it was  
11 | my desire to, to have the station built, perhaps selling it  
12 | later. She states that we have too much going on.

13 |       Q     Well, was there anything "perhaps" about the selling  
14 | it later or was it absolutely definite that it was going to be  
15 | built and then sold as opposed to built and programmed?

16 |       A     I don't think we could have made that judgement at  
17 | the time. I think we would have built it, operated it, and we  
18 | would have -- have had to see what benefits it might have  
19 | garnered. We might have decided later to sell it; we might  
20 | have decided later that it was doing well enough that we  
21 | wanted to keep it. I couldn't possibly have made that deci-  
22 | sion at that point.

23 |       Q     That isn't what this letter says, though, is it?

24 |       A     It says "he would like to have built that station,  
25 | selling it later." That was her understanding, I guess, or

1 her, at least her perception. I'm not sure it was mine.

2 Q Okay, could you please turn to Mass Media  
3 Exhibit 227?

4 A Yes, sir.

5 Q George Sebastian was the low-power coordinator for  
6 both Trinity and National Minority at this time, correct?

7 A Yes, sir.

8 Q So that the designation as such in the title or in  
9 the heading of this letter would be correct insofar as you  
10 were concerned?

11 A Yes.

12 Q Oh, one thing. We're going to go back to this  
13 Houston situation until we all have it memorized up, down, and  
14 sideways but in terms of the Houston situation, was there any  
15 problem with respect to the site that the station had in the  
16 grant that it received from the Commission?

17 A If there was, Mr. Shook, I'm not aware of it.

18 Q You're not aware of it.

19 A That's it.

20 Q Very good. Would you please turn to Mass Media  
21 Exhibit 228?

22 A Yes, sir.

23 Q Now if you look at the body of the letter, it refer-  
24 ences a, a PO, a purchase order number for Fresno, California.  
25 Fresno, California, the only station there is the National



1 Minority station, correct?

2 A Yes. We do have an affiliated -- it's not even an  
3 affiliated station. There is a full-power station that we  
4 simply purchase some time on for the "Praise the Lord" program  
5 only.

6 Q And that could provide coverage to areas that were  
7 not reached by the low-power station for National Minority?

8 A Yes, sir.

9 Q But the station that is referenced in this letter is  
10 the National Minority station, isn't it?

11 A Yes, sir.

12 Q Would you please turn to Mass Media Exhibit 229?

13 A Yes, sir.

14 Q Now, Patricia St. John Clerke is in the engineering  
15 department at Trinity?

16 A Yes, sir.

17 Q Would a letter of this nature have been sent without  
18 your having reviewed it?

19 A Absolutely.

20 Q Please turn to Mass Media Exhibit 230.

21 A Yes, sir.

22 Q This is a special meeting for National Minority TV  
23 that's being held December 12, 1988, and at this point in time  
24 Midland/Odessa had been on the air about a month and a half.

25 A Um-hum.